

EXHIBIT 3



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July 3, 2013

Marc E. Lipton
Lipton Law
18930 West Ten Mile Road, Suite 3000
Southfield, MI 48075

**Sent via US Mail and email to
marc@liptonlaw.com**

Re: Subpoena directed to Southeast Michigan Surgical Hospital
New England Compounding Pharmacy, Inc., Products Liability Litigation

Dear Mr. Lipton:

We represent Southeast Michigan Surgical Hospital, to which you have directed a subpoena issued in connection with the *New England Compounding Pharmacy* multi-district litigation. The Hospital is not a party to the MDL action.

We have reviewed the subpoena, including the 21 categories of documents described there, the attached notice of deposition *duces tecum*, your correspondence, and your firm's press release. We see in your papers no identification of any person treated by the Hospital. We are unable to determine the identity of any patient of the Southeast Michigan Surgical Hospital involved in the MDL action. You have not provided any papers or other evidence of representation of any patient of our client Hospital, represented by the PSC or any lawyer appearing in this case. Information held by our client therefore seems to have no relevance to the claims and defenses of the parties to the multi-district litigation.

If you can direct us to a plaintiff in the MDL action who was treated by Southeast Michigan Surgical Hospital with medication from NECP, we will revisit the question. I would be happy to talk with you about this at any time.

California | Illinois | Michigan | Minnesota | North Carolina | Texas | Washington, D.C.

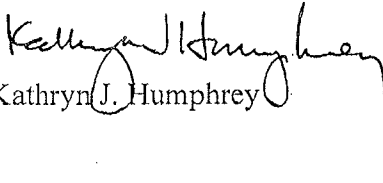
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Based upon the information available to us, we are filing a Notice of Limited Appearance in order to comply with Judge Saylor's June 21, 2013, order. We are also filing an Objection to the subpoena. It is our understanding that the Clerk's Office (by means of the ECF system) will distribute electronic copies of those documents to you and all other registered counsel. If for some reason you do not receive it, please let me know and I will provide you a copy by email directly.

Very truly yours,

DYKEMA GOSSETT PLLC


Kathryn J. Humphrey

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